

## EXHIBIT J

### Exhibit Request:

Attach as Exhibit J narrative descriptions of each service or function performed by the registrant.

### Response:

#### I. Introduction

Schvey, Inc., doing business as Axoni, sold the Veris platform, a post-trade reconciliation and lifecycle management platform for equity SBS transactions, to Applicant in October 2024. The Veris platform reduces the effort needed to reconcile post trade data and prevent cash flow breaks by enabling counterparties to share and compare data associated with equity SBS deals, positions, trades, and related cash flows throughout the post-trade lifecycle. Post execution, counterparties transmit to the Veris platform their post-execution swap data. The Veris platform provides real-time transparency to both counterparties on reconciliation exceptions and reduces operational risks including settlement delays. All equity SBS transactions are executed and settled outside of the Veris platform.

Axoni began offering the Veris platform commercially in 2020 to a select number of customers.

Axoni operated the Veris platform pursuant to the SEC's "Order Pursuant to Section 36 of the Securities Exchange Act of 1934 Granting Temporary Exemptions from Clearing Agency Registration Requirements under Section 17A(b) of the Exchange Act for Entities Providing Clearing Services for Security-Based Swaps" (the "**Order**"), under which Applicant will also continue to operate the Veris platform.<sup>1</sup>

The Applicant will introduce a standard rulebook framework in 2025 for the existing service provided by the Veris platform.

#### II. Product Functionality

The Veris platform is intended for use by both buy- and sell-side financial institutions that trade equity SBS. Only approved customers with an executed software license in place with Applicant are permitted to use the software.

The Veris platform provides the following functionality:

- Data Capture – The process by which the Veris platform ingests data through an API or FIX engine from customers of the Veris platform. The software subsequently creates, updates, or cancels the actioning customer's data records representing the equity SBS transactions.
- Post-Trade Data Pairing – The process by which key terms entered into by both counterparties (party A and party B) comprising a data record (equity SBS) are compared to identify which records from party A correspond to party B's version of those records. Once a pair is identified, a paired record is created.

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<sup>1</sup> Exchange Act Release No. 64796 (July 1, 2011); 76 Fed. Reg. 39964 (July 7, 2011).

- Data Reconciliation – The process by which paired records are compared on specific fields/terms relevant to the equity SBS. Counterparty data differences outside any thresholds are marked as exceptions.
- Data Enrichment – The process by which the system defaults/enriches certain data fields from higher hierarchical levels to lower data levels. For example, the software will automatically enrich transactional data with higher level data to streamline the user experience (e.g., ‘unwind methodology’ can be provided at the deal level).
- Amendments – The process by which the Veris platform allows a party to update/amend their data.
- Cancellation – The process by which customers cancel data records on the Veris platform. Canceled data may be replaced with a newer version of the record.
- User Interface (UI) – The Veris platform is connected to a UI to facilitate customer access to their data and provides exporting, audit history, affirmation and search.
- Affirmation - The process by which the Veris platform allows parties to affirm update/create their side of a paired record with the values of their counterparty.
- Account Mapping – The process by which the Veris platform allows customers to provide linkage between their transactional data and deal- (“wrapper”) level data based on account and market preferences.
- Trade Ordering – The process by which the Veris platform orders trades based on execution date/time and subsequently determines the type of trade activity. For example, if a trade type is a buildup, unwind, or full unwind.
- Position Calculation – The process by which the Veris platform independently calculates the quantity/number of securities on the position level based on the transactional records received for a given position.
- Corporate Action Outturn Position Updates – The process by which the Veris platform determines the net effect on a position (e.g., number of securities on a stock split) from corporate action transactions received from customers.
- Single Sided Flow – The process by which the Veris platform reconciles allocation instructions against risk bookings for a single party.
- Electronic Master Collateral Agreement (“MCA”) - The process by which the Veris platform allows creation and storage of an electronic representation of a Master Confirmation Agreement.
- Authentication and Permissions – The process by which the Veris platform manages permissions. The Veris platform allows customers to authenticate themselves on the application. Authentication grants customers the ability to access, create, and update their data for transactions to which they are a party.

The Veris platform **does not** provide the following functionality:

- Execution – The Veris platform does not allow customers to execute equity SBS transactions or transactions in the securities underlying the equity SBS.
- Settlement – The Veris platform does not settle equity SBS transactions or transactions in the securities underlying the equity SBS.
- Clearing – The Veris platform does not clear equity SBS transactions or transactions in the securities underlying the equity SBS.

### III. Description of Workflow

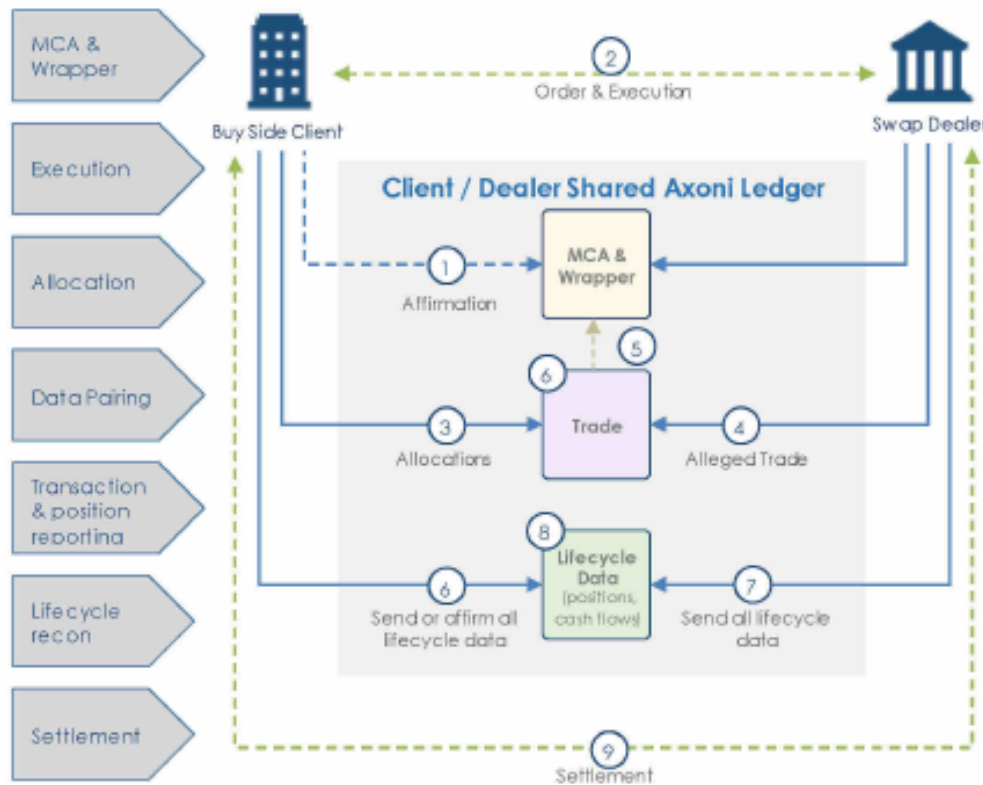
The following describes the Veris platform's workflow:

- As part of the client onboarding process, any customer permissions, reference data and documentation (e.g., MCA) are established in the system.
- Equity SBS execution occurs outside of the Veris platform.
- Workflows managing the processing of the underlying equity asset (execution, clearance and settlement) occur outside of the Veris platform through normal business channels.
- Parties transmit their post allocation swap data records to the Veris platform for Data Capture via API, FIX or UI Affirmation.
- The Veris platform processes the data to pair and reconcile any differences relative to counterparty submissions of their records.
- The Veris platform communicates the results of the reconciliation to parties via API and/or User Interface (UI).
- Each customer sends its version of all lifecycle data, including the following:
  - Amendments (e.g. financing re-rates);
  - Position accruals;
  - Cash flows; and
  - Corporate Action Outturns.
- The Veris platform continuously reconciles all lifecycle data throughout the life of the swap, highlighting exceptions to customers, while storing a unified record of paired data.
- Customers investigate and remediate exceptions identified by the Veris platform by updating their submissions upstream from the Veris platform to ensure swap data is in alignment with their counterparty's systems.
- Parties settle cash flows outside of the Veris platform.

# Exhibit J – Workflow Diagram



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**Legend:**  
 —> API message  
 - - -> Affirm / Click to Accept  
 - - - -> Process occurs off the platform

- ① Dealer & client upload (new or existing) MCA on the Axoni platform. Dealer also sets up a swap wrapper (e.g. fund level) for client to affirm
- ② Client sends order to Dealer outside of platform
- ③ Client sends a locations; platform will automatically map a location to the MCA & swap wrapper
- ④ Dealer submits a legged trade
- ⑤ Trade is processed through Veris:
  - a. Routed and linked to correct wrapper
  - b. Determine position effect
  - c. Enrich trade with wrapper details
- ⑥ The Veris platform processes the data to pair and reconcile any differences relative to counterparty submissions of their records
- ⑦ Both counterparties send their version of all lifecycle data. Including:
  - Amendments (e.g. financing re-rates)
  - Position Accruals
  - Cash Flows
  - Dividends
- ⑧ Platform continuously reconciles all lifecycle data, highlights exceptions to participants and stores golden record of paired data
- ⑨ Settle cash flows that were agreed on the platform